

REMARKS

This is intended to be a full and complete response to the Office Action dated January 04, 2006. In view of the following amendment and discussion, the Applicants believe that all claims are in allowable form.

ELECTION OF CLAIMS

The Applicants confirm the election of claims 1-15 of Group 1. Claims 16-21 have been cancelled without prejudice. The Applicants reserve the right to file continuing and/or divisional applications to further prosecute the cancelled subject matters.

IN THE SPECIFICATION

The Applicants have amended paragraphs 19 and 25 of the specification to correct minor errors.

AMENDMENT TO THE CLAIMS

The Applicants have amended the dependency of claim 12 to provide proper antecedent basis.

CLAIM REJECTIONS

35 U.S.C. §103 Claims 1-9 and 11-15

Claims 1-9 and 11-15 stand rejected under 35 U.S.C. § 103 as being unpatentable over Figure 7 (hereinafter referred to as "*Figure 7*") in view of United States Patent No. 6,453,214 issued September 17, 2002 to *Bacchi, et al.*, (hereinafter referred to as "*Bacchi*"). In response, the Applicants respectfully disagree.

Independent claim 1 recites limitations not taught or disclosed in the combination of *Figure 7* and *Bacchi*. The Applicants describe *Figure 7* in the specification as a conventional single-blade substrate transfer robot used in semiconductor processing systems. However, the teaching of *Figure 7* does not teach or disclose providing at least one sensor decoupled from a robot, as recited by claim 1.

Bacchi discloses using edge sensors and bottom sensors disposed on a substrate support operably connected to a robot arm to provide the robot arm extension and elevation positioning data. (Col. 2, Lines 33-34.). *Bacchi* teaches positioning edge sensors and/or the bottom sensors at the proximal end and/or the distal end of the substrate support. (Col. 2, Lines 62-67, Col. 3, Lines 1-2). In other words, the sensors taught in *Bacchi* are disposed on the substrate support and are thus coupled to the robot.

Bacchi does not teach or suggest a substrate support coupled to a robot, and at least one sensor decoupled from a robot, as recited in claim 1. There is no teaching from *Bacchi* that would suggest a modification to *Figure 7* that would yield a substrate support coupled to a robot, and at least one sensor decoupled from a robot, as recited by claim 1. Therefore, the Applicants submit that a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all of the elements of claim 1.

The Applicants submit that the Examiner has misinterpreted the claims in the present application, and under a proper interpretation of the claims, the references of record do not teach or suggest all of the elements recited in the claims, and as such, cannot support a *prima facie* case of obviousness.

The standard for claim interpretation during the examination of a patent application by the U.S. Patent and Trademark Office is that "claims ... are to be given their **broadest reasonable** interpretation consistent with the specification, **and ... claim language should be read in light of the specification as it would be interpreted by one of ordinary skill in the art.**" Moreover, this interpretation must be consistent with one that would be reached by those skilled in the art. *In re American Academy of Science Tech Center*, 367 F.3d 1359, 1365; 70 U.S.P.Q. 2D (BNA) 1827 (Fed. Cir. 2004), citing *In re Bond*, 910 F.2d 831, 833 (Fed. Cir. 1990) and *In re Cortright*, 165 F.3d 1353, 1358 (Fed. Cir. 1999) (emphasis added). In the present examination, the claims have not been reasonably interpreted in a manner consistent with the specification nor in a manner consistent with an interpretation utilized by those skilled in the art for the reasons given above.

The examiner has over-broadly interpreted that a specimen sensing end effector with a specimen stored on a container, as taught in *Bacchi*, equates to a sensor decoupled from a robot, as claimed by the Applicants. However, in applying the broadest reasonable meaning to the claim language, definitions presented in the specification must be taken into account. *In re American Academy of Science Tech Center*, 367 F.3d at 1365. In the present application, the Applicants have defined that the robot includes one or more substrate support(s) to support the substrate and at least one sensor is decoupled from the robot. See, e.g., Application paragraphs [0022-0023]. As such, the decoupled sensor is not coupled to the substrate support because the substrate support is included in the robot which, in turn, is decoupled from the sensor (see, e.g., claim 1).

Moreover, in giving the claims their broadest reasonable interpretation, the interpretation utilized during examination of the application must be consistent with that which one skilled in the art would utilize. *In re American Academy of Science Tech Center*, 367 F.3d 1365. Here, the Applicants can find no support for the interpretation that the decoupled sensors may be stored on a container on a substrate support that is not connected to or away from the robot. In contrast, *Bacchi* teaches end effectors that are “operably connected to a robot arm.” See, *Bacchi* Col. 2, line 33. The Applicants submit that one skilled in the art would interpret sensors decoupled from a robot to exclude sensors coupled to an end effector because *Bacchi* teaches that end effectors are coupled the robot, and consequently, sensors coupled to the end effectors are also coupled to the robot. Therefore, for at least these reasons, *Bacchi* does not teach or suggest at least one sensor decoupled from the robot, as recited by claim 1.

Thus, the Applicants submit that independent claim 1, and all claims depending therefrom, is patentable over the combination of *Figure 7* and *Bacchi*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

ALLOWED CLAIMS

The Applicants thank the Examiner for the allowability of claims 10 if rewritten in independent form to include all the limitations of the base claims. However, in light of the reasons set forth above, the Applicants submit that all claims are allowable.

NEW CLAIMS

The Applicants have added new claims 22-25. The Applicants believe that the new claims are fully supported by the specification and are patentable over the references of record. Thus, the Applicants submit that no new matter has been added and respectfully request allowance of these claims.

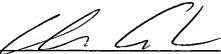
CONCLUSION

Thus, the Applicants submit that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and swift passage to issue are earnestly solicited.

If the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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Date



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